

Connecting Consumer Product Use to Surface Water Two Drainage Systems



Storm Drain



Sewer

POTW (WWTP)









Continuous Discharges

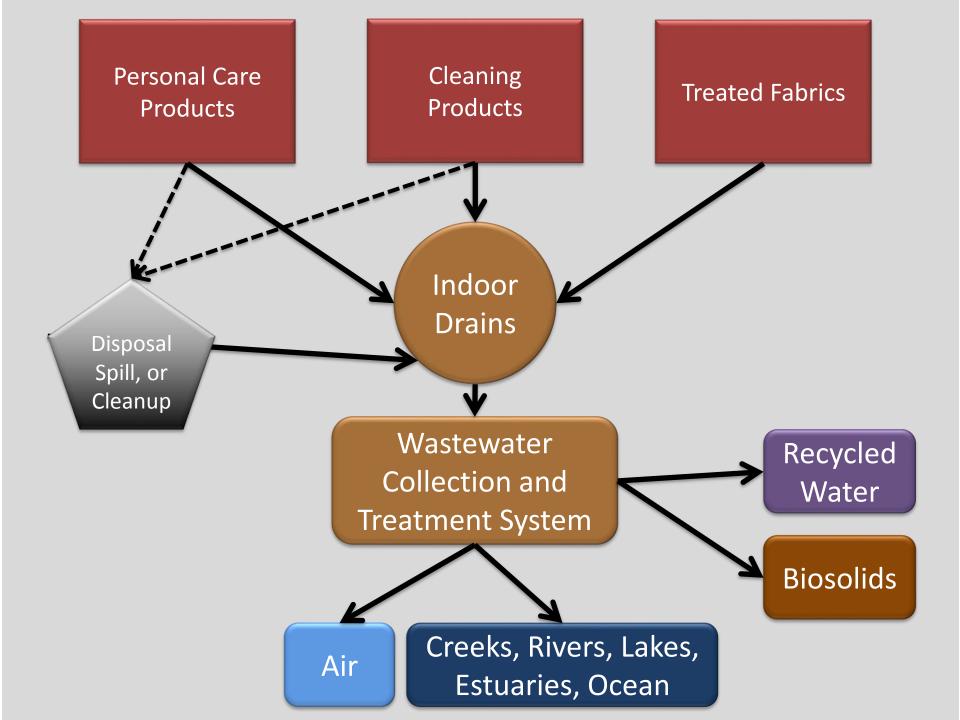


Cleaning and Personal Care Products Clothing/Fabric Treatments





Widespread, Relatively Steady Discharges to POTWs



Dilution Reduced by Water Conservation

Low flow toilets, washers & showers

=>

Reduced POTW flows

Location	Per Capita Indoor Water Use (Liters)	Source
USA 1996	388	USEPA POTW survey
California Jan. 2016 (includes outdoor)	230 (Statewide) <190 (Many cities)	CA State Water Board

Zero Dilution POTW Effluent Common

- California "Effluent dominated waters" include creeks, rivers, portions of estuaries
- Many POTWs have ZERO effluent dilution in NPDES permits
 - California ≈20% of permits zero dilution
 - Effluent >90% of stream flow for 49% of a representative sample of major POTWs in TX, OK, NM, AR, LA*
- USA ≈23% of POTWs have <10x dilution*
- "Diluting" waters can contain the pollutant

Other POTW Considerations

- 1. Wastewater as a Resource
 - Irrigation
 - Human consumption: potable reuse
- 2. Biosolids a resource not a waste
- 3. POTW Operational interference
 - Biological Processes
 - OPPTS 835-3240 Activated sludge respiration inhibition
- 4. US Clean Water Act Compliance
 - Toxicity and other narrative standards

100% of POTWs must comply with the Federal Clean Water Act 100% of the time



Storm Drain



Episodic discharges (rainfall / runoff)
Continuous discharges (irrigation/other)

Paint & Other Building Materials Exposed to Rain

Widespread, primarily episodic discharges to storm drains

Weathering often modifies leaching rates



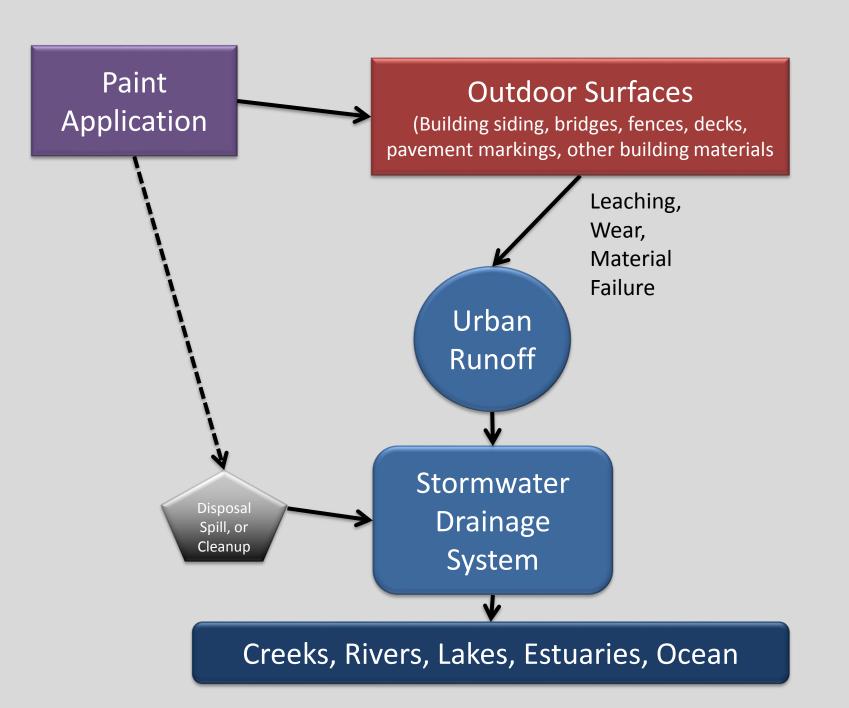












Zero Dilution Urban Runoff is Norm in Wet Weather in California Creeks

Trickles can become torrents when it rains

Dry weather flow may be low dilution as well



Triclosan Alternatives?

- > 250 EPA-Registered antimicrobials
- FDA also regulates antimicrobials in products
- Typical antimicrobial purposes:
 - Protect products e.g., chemicals that prevent bacteria growth, odor, mildew
 - Usually lower concentration
 - Protect user or application site e.g., disinfectants/ sanitizers for surfaces, drinking water, swimming pools; boat bottom paint; cooling water biocides
 - Usually higher concentration

Triclosan Alternatives? Other Antimicrobials Have Potential to Cause Water Pollution

Example: Informal POTW watch list based on EPA reviews, scientific literature

- High aquatic toxicity (most sensitive standard test species)
- Use pattern linked to sewer discharges
- Monitoring data (if available) and/or EPA modeling close to or exceeding aquatic toxicity threshold

Not comprehensive - Not necessarily Triclosan alternatives

Informal POTW Antimicrobials Watch List

1,2-Benzisothiazolin-3-one

(BIT)

Bronopol (Bioban)

Busan 1024

Carbendazim (MBC)

Chlorhexidine

Chlorinated isocyanurates

DIDAC

Folpet

Fludioxonil

Halohydantoins

Imidazolidinedione

IPBC

o-Benzyl-p-chlorophenol

Octhilinone

o-Phenyl phenol

Polyhexamethylenebiguanide

(PHMB)

Triclosan

Not comprehensive - Not necessarily Triclosan alternatives

